



January 13, 2023

VIA ECF

Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street, Courtroom 521
White Plains, New York 10601

**Re: *Finn v. Empress Ambulance Services, Inc. d/b/a Empress EMS,*
*Case No. 7:22-cv-08101-KMK (the "Finn Action")***

Dear Judge Karas:

As you know, we represent Plaintiff Finn in the above-captioned *Finn Action*. Plaintiff Finn writes jointly with Defendant Empress Ambulance Service, LLC (“Empress”) pursuant to the Court’s November 14, 2022 Order [ECF No. 17] requiring the parties to the *Finn Action* to submit joint status reports to the public docket providing updates on the progress of settlement negotiations every 14 days. The fifth status report is due today, January 13, 2023.

Since the parties’ previous status report, they have continued to meet and confer and conduct diligent settlement negotiations. Empress is presently reviewing the terms of a proposed Settlement Agreement provided by Plaintiff’s counsel. At our request, Empress continues to voluntarily data mine for additional information that could increase the reach of the negotiated class action settlement.

The request for proposal and negotiation process with settlement administrators has been thorough and extensive. We have focused our negotiations with potential administrators on achieving robust notice and reach while ensuring that any notice plan will be cost-effective and the best notice practicable. The parties have now agreed upon and committed to a settlement administrator for this settlement. The parties are finalizing negotiations of a Business Associate Agreement with the selected settlement administrator.

The parties continue to work earnestly toward finalizing the terms of the settlement and the settlement agreement. We respectfully request that the Court continue to stay the later-filed actions

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during this process. The parties will continue making progress on the settlement during the next two weeks and, in accordance with the Court's November 14, 2022 Order, will provide another status update on January 27, 2023.

Respectfully submitted,

AHDOOT & WOLFSON, PC



Tina Wolfson

cc: All counsel of record (via ECF)